

REMARKS

In response to the Office Action dated December 7, 2005, Applicant respectfully requests reconsideration based on the above claim amendments and the following remarks. Applicant respectfully submits that the claims as presented are in condition for allowance.

Applicant has amended independent claims 1, 18, 31, and 36. Dependent claims 5-11, 17, 20-26, and 30 have been amended to be consistent with the amendments made to their respective independent claims. Applicant has not deleted or added any claims. Thus, claims 1-36 are pending in the present application.

Claim Rejections – 35 U.S.C. § 103(a)

Claims 1, 2, 6-16, 18, 19, 23-29, and 36

In the Office Action, claims 1, 2, 6-16, 18, 19, 23-29, and 36 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,342,890 to Shetter (“Shetter”) in view of U.S. Patent No. 5,613,103 to Nobutani et al. (“Nobutani”). Applicant respectfully traverses the rejection and respectfully requests reconsideration and withdrawal.

Independent claims 1, 18, and 36, though not identical in scope or content, are each related to the general idea of updating an image on a computer display device through the use of zones of the image. Claims 1, 18, and 36 have each been amended to include the features of “storing each zone of the plurality of zones by a starting point of each zone” and “tracking revised zones using the starting point of each revised zone.” Page 9, paragraph 34 of the original specification provides support for the amendments.

Neither Shetter nor Nobutani, either alone or in combination, suggest the use of a starting point of a zone for storing the zone and tracking revisions to zones. Shetter is directed to accessing blocks of over-sampled sub-pixels of an image. The desired blocks to be accessed are shifted to account for a remainder of the display of the image. Nobutani is directed to a display control system and method that incorporate the use of flag groups to display data on a screen. A first flag group corresponds to a line of the display data, and a second flag group corresponds to a group of first flag groups. Since the combination of Shetter and Nobutani fails to teach or suggest the new element of amended claims 1, 18, and 36, a *prima facie* case of obviousness cannot be established because all elements are not present in any combination of Shetter and Nobutani.

Claims 2 and 6-16 are dependent upon amended claim 1; and claims 19 and 23-29 are dependent upon amended claim 18. Accordingly these claims cannot be unpatentable over the art of record for the same reasons as noted above with respect to claims 1 and 18.

Therefore, for the reasons stated above, Applicant respectfully requests withdrawal of the § 103(a) rejection of claims 1, 2, 6-16, 18, 19, 23-29, and 36 because these claims patentably define over the cited art.

Claims 3-5 and 20-22

In the Office Action, claims 3-5 and 20-22 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shetter and Nobutani in view of U.S. Patent No. 6,633,685 to Kusama et al. ("Kusama"). Applicant respectfully traverses the rejection and respectfully requests reconsideration and withdrawal.

Claims 3-5 are dependent upon amended, independent claim 1, and claims 20-22 are dependent upon amended, independent claim 18; thus, claims 3-5 and 20-22 are patentable for the same reasons as noted above by Applicant with respect to claims 1 and 18. Kusama does not remedy the deficiency of the Shetter and Nobutani combination as Kusama, while disclosing the generation of a mosaic image through the use of images of varying resolutions, fails to disclose or suggest the incorporation of a starting point of a zone for use in storing zones and tracking changes to zones. Therefore, withdrawal of the rejections of claims 3-5 and 20-22 under 35 U.S.C. § 103(a) is respectfully requested.

Claims 17 and 30

In the Office Action, claims 17 and 30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shetter and Nobutani in view of U.S. Patent No. 5,877,779 to Goldberg et al. ("Goldberg"). Applicant respectfully traverses the rejection and respectfully requests reconsideration and withdrawal.

Claim 17 is dependent upon amended, independent claim 1, and claim 30 is dependent upon amended, independent claim 18; thus, claims 17 and 30 are patentable for the same reasons as noted above by Applicant with respect to claims 1 and 18. Goldberg fails to cure the deficiency of the Shetter and Nobutani combination. Goldberg, while disclosing the rendering of an object onto a display, fails to disclose or suggest the incorporation of a starting point of a zone for use in storing zones and tracking changes to zones. Therefore,

withdrawal of the rejections of claims 17 and 30 under 35 U.S.C. § 103(a) is respectfully requested.

Claims 31-35

In the Office Action, claims 31-35 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shetter and Nobutani in view of U.S. Patent No. 6,675,239 to Van Hook et al. ("Van Hook"). Applicant respectfully traverses the rejection and respectfully requests reconsideration and withdrawal.

Independent claim 31 has been amended, similarly to claims 1, 18, and 36, to recite "a zone grid in memory for tracking by a starting point of each zone whether changes occur in each zone of said plurality of zones;" and "a processing unit for rendering revisions to shadow memory and tracking by a starting point of each zone in said zone grid which zones of said plurality of zones are revised." This amendment is supported at least by page 9, paragraph 34 of the original specification.

However, Shetter, Nobutani, and Van Hook, considered either alone or in combination, do not suggest or teach the use of a starting point of a zone for storing the zone and tracking revisions to zones. Van Hook teaches the use of a command memory for graphics processing and does not mention the use of zones. Since the combination of Shetter, Nobutani, and Van Hook fails to teach or suggest the new element of amended claim 31, a *prima facie* case of obviousness cannot be established because all elements are not present in any combination of Shetter, Nobutani, and Van Hook.

Claims 32-35 are dependent upon amended claim 31, and these claims cannot be unpatentable over the art of record for the same reasons as noted above with respect to claim 31.

Therefore, for the reasons stated above, Applicant respectfully requests withdrawal of the § 103(a) rejection of claims 31-35 because these claims patentably define over the cited art.

Conclusion

For all the foregoing reasons, Applicant respectfully submits that the pending claims patentably define over the cited art. Accordingly, a Notice of Allowance for claims 1-36 is respectfully requested. In the event, however, that the Examiner believes that the application

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is not allowable for any reason, the Examiner is encouraged to contact the undersigned agent to discuss resolution of any remaining issues.

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